

B. Remarks

In the above-noted Office Action, claims 1, 2, 8, 13, 14, 16 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hendriksma et al (U.S. 6,591,798). Claims 3 and 15 were rejected under 35 U.S.C. 103 as being unpatentable over Hendriksma, in view of legal precedent. Claims 4, 9 and 10 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hendriksma, in view of Jahr (U.S. 6,318,318). Claims 5-7, 11-12, and 17-20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hendriksma, in view of Yoeda et al (U.S. 6,405,693). Claim 20 was rejected for the reasons set forth in the rejection of claims 1, 3, 5, 13, 14, and 19.

With this amendment, Applicants amend claims 1 and 8. Reexamination and reconsideration of the non-allowed claims are respected requested.

Applicants submit that Hendriksma, taken singularly or in combination with the other cited references, or combined with legal precedent, fails to teach, disclose, suggest or obviate Applicants' invention as originally filed or amended, in claims 1, 8, 13 or 20.

Specifically, Hendriksma fails to provide a first body with an aperture to facilitate connection of the body to a cylinder head and wherein the first body has a cut out for receivingly mounting a cam shaft. The items 10 or 14 do not have a cut out for receivingly mounting a camshaft, as does Applicants' invention. The items 10 and 14 are not a part typically referred to as the cam shaft bearing ladder. The cam shaft bearing ladder, (not shown in Hendriksma patent), is a part which would be mounted on top of the bearing mounts 92 (best shown in Figure 3). Hendriksma's body (item 14) shown in Figure 3 mounted on top of a portion of the engine head, designated as item 94, does not mount the cam shaft. The Hendriksma's body 14 (referred to in the patent as the arbor), mounts two substantially identical variable valve actuation assemblies.

In sharp contrast, as shown in Applicants' Figures 2 and 4, the cam shaft bearing ladder or cam shaft bearing cap ladder is referred to as item 210. Applicants' cam shaft bearing ladder 210 receivably mounts two camshafts 267.

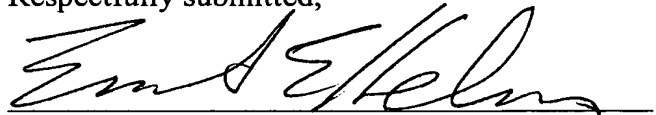
The addition of any other references cited by the Examiner fails to bring forth internal combustion engine cylinder head cam shaft bearing ladder having a first body with an aperture to facilitate threaded connection to the cylinder head which additionally has a cut out for receivingly mounting a cam shaft, in addition to having a pocket with a solenoid actuator positioned therein.

Accordingly, the references cited by the Examiner fail to bring forth Applicants' invention as defined in the claims.

Applicants' response to the rejection of the remaining claims is incorporated in Applicants' response to the rejection of claim 1. Therefore, it is not repeated in interest of conservation of the Examiner's valuable time.

By this amendment, Applicants have shown wherein the Examiner's rejections are respectively traversed. As the application is otherwise in condition for allowance, such action is respectfully requested.

Respectfully submitted,



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